

WILLIAMS LLP

NEW YORK | COLORADO
TELEPHONE: 212.634.9106
FACSIMILE: 212.634.9106
WWW.WMSINTL.COM

7 WORLD TRADE CENTER
250 GREENWICH STREET, 46TH FLOOR
NEW YORK, NY 10007

March 25, 2020

VIA ECF

The Honorable Thomas McAvoy
United States District Court
Northern District of New York
15 Henry Street
Binghamton, NY 13901

RE: Serenity Alpha LLC et. al. v. Northway Mining LLC et. al., Case No. 19cv00501, Letter Motion for Standing Order to Add Additional Fraudulent Transfer Defendants and to Issue Summons on Newly Discovered Defendants

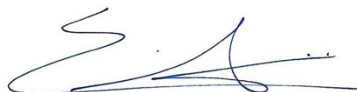
Dear Judge McAvoy:

As I stated in Plaintiffs' March 12, 2020 Letter Motion, Defendants, Michael Maranda, and entities related to him, have continued to transferred assets to third parties and other companies they have formed. Recently, in keeping with their *modus operandi*, Defendants formed Oswego Data LLC and transferred assets and money belonging to Plaintiffs to Oswego Data LLC. Defendants also transferred Plaintiffs' money and assets to Lori S. Thompson-Maranda, and to Lori S. Thompson-Maranda LCSW PLLC.

Plaintiffs have amended the caption of their Complaint to reflect the addition of the newly discovered Defendants. Plaintiffs have attached, as **Exhibit A**, Summons to be issued on Oswego Data LLC, on Lori S. Thompson-Maranda, and on Lori S. Thompson-Maranda LCSW PLLC.

Plaintiffs further request that this Court issue a standing order that allow Plaintiffs to continuously add individuals and entities to this lawsuit as Plaintiffs discover these individuals and entities.

Sincerely,



T. Edward Williams, Esq.